

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	CRIMINAL NO. 05-30017-MAP
	)	
CARLOS MARRERO	)	

ASSENTED-TO MOTION TO CONTINUE STATUS CONFERENCE

Defendant, Carlos Marrero, moves that the Court continue the status conference presently scheduled for June 14, 2006 to a date convenient to the Court but no sooner than July 17, 2006. As grounds for this motion, defendant counsel states that he needs additional time to conduct factual and legal research in order to reliably report to the Court whether the case will be tried or disposed of short of trial. As additional grounds, defendant through counsel refers to the memorandum filed herewith under seal.

The government assents to this Motion. The parties agree that the time period beginning on June 14, 2006 and concluding on the date of the rescheduled status conference is excludable from the Speedy Trial Act pursuant to 18 U.S.C. § 3161(h)(8)(A) & (B) because a continuance is in the interests of justice to allow the parties to engage in continued plea negotiations.

CARLOS MARRERO  
By His Attorney,

/s/ Timothy G. Watkins  
Timothy G. Watkins  
B.B.O. #567992  
Federal Defender Office  
408 Atlantic Avenue, 3<sup>rd</sup> Floor  
Boston, MA 02110  
Tel: 617-223-8061

CERTIFICATE OF SERVICE

I, Timothy G. Watkins, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on June 15, 2006.